

ORIGINAL

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October 28, 1999

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Ex Parte

Ms. Magalie Roman Salas  
Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St., S.W.  
Washington, D.C. 20554

**Re: Deployment of Wireline Services Offering Advanced Services Capability –  
CC Docket No. 98-147**

Dear Ms. Salas:

Yesterday, on behalf of Bell Atlantic, Frank Gumper, Donna Epps, Augie Trinchese, and I met with Bob Atkinson, William Bailey, Margaret Egler, David Hunt, Carol Matthey, and Stacie Pies of the Common Carrier Bureau to discuss the above captioned proceeding. The attached material was used during the meeting.

Please enter this material into the record as appropriate. Should you have any questions please do not hesitate to contact me.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Joe Mulieri'.

Attachment

Cc: B. Atkinson  
W. Bailey  
M. Egler  
D. Hunt  
C. Matthey  
S. Pies

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List ABCDE



# **Line Sharing**

**October 27, 1999**



## **Line Sharing**

### **Discussion Outline**

- **Why Line Sharing Is Simply Bad Policy**
- **How Line Sharing Is Different From Any Bell Atlantic Service Offering, Including BA's ADSL Service**
- **Why The Proposed 2-4 Week Implementation For Line Sharing Is Unrealistic And Operationally Impossible**
- **Recommendation**



## **Line Sharing Is Simply Bad Policy**

- Line Sharing, As Currently Proposed, Is Biased In Favor Of Data-Only CLECs And Will Inhibit Competitive Alternatives
  - Proposed Plan Is A Barrier To Voice-Only CLECs
  - ILECs Precluded From Providing Only Data To CLEC Voice Customer
- Serves A “Niche” Market And Is Inconsistent With Prior Commission Rulings
  - Local Competition Order
  - GTE ADSL Tariff - October 30, 1998
  - FCC Staff Report “Broadband Today” October 1999
- The Commission Historically Has Recognized That It Was A Carrier’s Choice What Services To Offer Or Not Offer On A UNE Loop
- Will Not Be Consumer Friendly And May Hurt Service Quality
- Will Discourage Investment In Facilities And Retards Network Modernization



## **Line Sharing Is Not Consumer Friendly And May Hurt Service Quality**

- Two Carriers Sharing The Loop To Provide Two Different Services Introduces New Complexities In Provisioning, Testing, And Repair Processes
- Close ILEC/CLEC Coordination Will Be Required To Maintain Service Quality
- Consumers May Be Confused When Trying To Switch Their Voice Provider
  - For Example, Voice-Only CLEC May Not Know That Their Potential ILEC Customer Has Line Sharing



- **Line Sharing Is Unlike Any Bell Atlantic Service Offering, Including BA's ADSL Service**

- As A New Offering, It Must Be Defined Before Service Development Can Begin
- The FCC Must First Specify ILEC/CLEC Obligations
- Service Definition/Design Will Require Industry Collaboration

- **Preliminary Analysis Suggests That Line Sharing Will Take 9-12 Months To Implement After Firm Definition Of Offering**

- Complex Undertaking - OSSs/Processes Will Need To Be Enhanced
- Requires Close Coordination Between ILEC/CLEC For Service Provisioning, Maintenance And Repair
- Immediate Implementation Would Be Irresponsible And Impossible



## **Line Sharing Is Unlike Any UNE Or Retail Bell Atlantic Service Offering, Including BA's ADSL Service**

### ***From A Service Architecture Perspective***

- Two Carriers Sharing Spectrum On The Same Loop
- Introduces A New Network Component - The Splitter

### ***From A BA Process Perspective***

Two Different Services Over The Same Loop To Two Different Customers:

(a) Line Sharing To CLEC; and, (b) Voice To The End-User

### ***From A Customer Care Perspective***

- Two Carriers (Some Cases Three Providers) Providing Two Different "Retail" Services To The Same End-User Over The Same Loop
- Service Provisioning, Testing, And Maintenance Requires ILEC/CLEC Coordination
- Line Sharing Service Option Is Conditioned Upon BA Provision of Voice Service



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## Timing

### **The proposed 2-4 Week Implementation Of Line Sharing is Unrealistic And Operationally Impossible**

- Significant Departure From Existing BA's Service Offerings, Including BA's ADSL Volume Discount Offering
- Line Sharing Raises Customer Care Issues Which Must Be Carefully Considered And Addressed
- Traditional Service Development Process Must Be Followed To Avoid Service Disruption And To Provide For Efficient Provisioning
  - Service Definition Is The Required First Step
  - USOCs/FID/Service May Take Three Months or Longer
  - Change Control Process Requires A Two Month Notice For LSR Changes
  - Software Development And Deployment 6-9 Months
  - Splitter Procurement And Deployment Will Take Time
- Overall Timeline Is Estimated To Be Not Less Than 9 to 12 Months After Firm Definition. Dependent On Y2K And Third Party Vendor Issues.



## **BA Recommends That The FCC Commission An Industry Forum**

- Facilitate Industry Discussion
  - Gather Additional Information
  - Evaluate Technical, Operational, And Service Quality Issues
  - Develop Proposals And Recommendations
- 
- Processes and OSSs Must Be Thoroughly Tested Before Line Sharing Is Introduced To Assure Seamless Transition To End Users